UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DOCKET NO. 05-30074-MAP

TAMMY WALKER,	
Plaintiff)
)
v.)
)
CITY OF HOLYOKE,)
Defendant)
V	

PROPOSED ORDER FOR CONFIDENTIALITY

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the parties in the aboveentitled action are hereby ordered that with respect to documentary evidence only produced by the defendant with regard to complaints, grievances and/or discipline (including special orders) with regard to former Sergeant Robert Wagner from January 1, 2001 through December 31, 2005, the following restrictions will apply:

- 1. The documents will be used by the parties, their respective counsel, associated attorneys, their retained experts or consultants, and the reasonable staff members employed by each of these individuals solely for the purpose of the above-captioned litigation.
- 2. The documents will be disclosed by the parties, their respective counsel, their retained experts and the reasonable staff members employed by each of these individuals only to those persons who reasonably require the information in connection with the above-captioned litigation, e.g. the U.S. District Court, deposition and court reporters, deponents and/or witnesses.
- 3. At the conclusion of this action, the parties, their counsel, their retained experts and the reasonable staff members employed by each of these individuals will return the

documents to the City of Holyoke or counsel may destroy the documents, including all copies of such documents caused or permitted to be made.

Respectfully submitted,

Tammy Walker By Her Attorney City of Holyoke By Its Attorney

\s\ Ozell Hudson, Jr.

Ozell Hudson, Jr., BBO#556269 434 Massachusetts Avenue, Suite 402 Boston, MA 02118 \s\ Carole Sakowski Lynch

Carole Sakowski Lynch, BBO# 547718 Morrison Mahoney, LLP P.O. Box 15387 1500 Main Street, Suite 2400 Springfield, MA 01115

It is so ordered.

Date: Documb 22, 200 6

Kenneth P. Neiman Magistrate Judge

I hereby certify that this document, filed through the ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on December 2I, 2006. /s/ Carole Sakowski Lynch